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EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
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May 17, 1991

91-RF-2861

Robert M. Nelson, Jr.
Manager
DOE RFO

Attn: D. P. Simonson

ENVIRONMENTAL PROTECTION AGENCY (EPA) SUPERFUND INNOVATIVE TECHNOLOGY
EVALUATION (SITE) DEMONSTRATION - JMK-0119-91

The Environmental Management Department (EM) of EG&G Rocky Flats, Inc. is supportive of both developing a cooperative relationship with EPA's SITE program and producing a positive demonstration of technologies applicable to RFP's environmental remediation needs. RFO and EG&G are being asked to consider a specific SITE-sponsored treatment technology, radionuclides removal from groundwater at the Interceptor Trench Pump House (ITPH). EM's Remediation Programs Division staff has identified some key issues which should be considered before RFP makes commitments to this near-term program.

- A. Technical Merit -- Techtran (owner of the technology) has not made sufficient information available to RFP to allow the evaluation of process design or effectiveness. Its information is fragmentary and oriented more toward marketing than toward clear documentation of process specifics for use by the technical decision maker.
- B. Regulatory Concerns -- An important issue is the relationship of this technology demonstration to "treatability studies." EPA Region VIII and the Colorado Department of Health (CDH) strongly affirm that an environmental restoration technology demonstration may only be done under their control. The only control mechanisms in place are the Interagency Agreement-defined Sitewide Treatability Study and the treatability studies which may be performed to support Feasibility Studies within individual operable units. As pointed out in the letter dated May 6, 1991 from F. R. Lockhart to D. P. Simonson, EPA Region VIII and CDH are also concerned about the SITE public comment period negatively impacting the public involvement programs of the IAG-required treatability studies.

CLASSIFICATION:

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INCLASSIFIED		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CONFIDENTIAL		<input type="checkbox"/>	<input type="checkbox"/>
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AUTHORIZED CLASSIFIER

SIGNATURE
W. H. Bennett

DATE *12/16/91*
IN REPLY TO LTR NO.

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TR APPROVALS:
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ADMIN RECORD

A-SW-001744

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- C. Funding -- No funds have been allocated to this project for FY91. An initial evaluation of the cost to EG&G of supporting the implementation of this project at RFP has been performed and has previously been transmitted to you.
- D. Liability -- Techtran has a bond for their equipment and personnel. There is no mechanism for Techtran, EPA/SITE, or PRC (EPA's management contractor for the SITE program) to cover liability for environmental releases, consequent damage, violation of regulations, or public relations consequences to RFP of any of the above.
- E. Logistics -- This matter will present many challenges, notably issues surrounding management of residuals from this demonstration, and coordination of a daunting array of RFP procedural hurdles.
- F. Agency Fragmentation -- It has become apparent that within EPA there are some inconsistent signals regarding implementation of this specific technology at RFP at this time. EPA/SITE in Cincinnati is enthusiastic, while the Region VIII staff, who regulate RFP's environmental restoration activities, express serious reservations, such as those summarized in ERD:SG:3449 (F. R. Lockhart to D. P. Simonson, May 6, 1991).

Requested Response

EG&G requests guidance on whether, and under what terms, we should proceed with this particular SITE demonstration, given the uncertainties which this vendor's program entails. The SITE program and all other environmental restoration treatability studies are being coordinated within EG&G by the Environmental Management Department, specifically T. C. Greengard. Please contact Tom at extension 7121, or Erich Evered at extension 4934, to discuss the proposed SITE program.


J. M. Kersh, Associate General Manager
Environmental & Waste Management
EG&G Rocky Flats, Inc.

GMA:plf

Orig. and 2 cc - R. M. Nelson, Jr.